

JMH:SP
F. #2023R00375

FILED
IN CLERK'S OFFICE
US DISTRICT COURT
E.D.N.Y.
* NOVEMBER 17, 2023 *
BROOKLYN OFFICE

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK
----- X

UNITED STATES OF AMERICA

- against -

JAMES YOUNG,

Defendant.

----- X

I N D I C T M E N T

Cr. No. 23-CR-475

(T. 18, U.S.C., §§ 924(d)(1),
981(a)(1)(C), 1951(a), 2 and 3551
et seq.; T. 21, U.S.C., § 853(p);
T. 28, U.S.C., § 2461(c))

Judge Dora Lizette Irizarry
Magistrate Judge Taryn A. Merkl

THE GRAND JURY CHARGES:

COUNT ONE
(Hobbs Act Robbery)

1. On or about April 12, 2023, within the Eastern District of New York and elsewhere, the defendant JAMES YOUNG, together with others, did knowingly and intentionally obstruct, delay and affect commerce, and the movement of articles and commodities in commerce, by robbery, to wit: the robbery of United States currency from a deli and smoke shop located on Broadway in Queens, New York, the identity of which is known to the Grand Jury.

(Title 18, United States Code, Sections 1951(a), 2 and 3551 et seq.)

COUNT TWO
(Hobbs Act Robbery)

2. On or about April 29, 2023, within the Eastern District of New York and elsewhere, the defendant JAMES YOUNG, together with others, did knowingly and intentionally obstruct, delay and affect commerce, and the movement of articles and commodities in

commerce, by robbery, to wit: the robbery of United States currency and cigarettes from a deli located on Northern Boulevard in Queens, New York, the identity of which is known to the Grand Jury.

(Title 18, United States Code, Sections 1951(a), 2 and 3551 *et seq.*)

COUNT THREE
(Hobbs Act Robbery)

3. On or about June 26, 2023, within the Eastern District of New York and elsewhere, the defendant JAMES YOUNG, together with others, did knowingly and intentionally obstruct, delay and affect commerce, and the movement of articles and commodities in commerce, by robbery, to wit: the robbery of United States currency from a grocery store located on Manhattan Avenue in Brooklyn, New York, the identity of which is known to the Grand Jury.

(Title 18, United States Code, Sections 1951(a), 2 and 3551 *et seq.*)

COUNT FOUR
(Hobbs Act Robbery)

4. On or about July 18, 2023, within the Eastern District of New York and elsewhere, the defendant JAMES YOUNG, together with others, did knowingly and intentionally obstruct, delay and affect commerce, and the movement of articles and commodities in commerce, by robbery, to wit: the robbery of United States currency from a deli and smoke shop located on Broadway in Queens, New York, the identity of which is known to the Grand Jury.

(Title 18, United States Code, Sections 1951(a), 2 and 3551 *et seq.*)

CRIMINAL FORFEITURE ALLEGATION

5. The United States hereby gives notice to the defendant that, upon his conviction of any of the offenses charged herein, the government will seek forfeiture in accordance with: (a) Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United

States Code, Section 2461(c), which requires any person convicted of such offense to forfeit any property, real or personal, constituting or derived from proceeds obtained directly or indirectly as a result of such offenses; and (b) Title 18, United States Code, Section 924(d)(1) and Title 28, United States Code, 2461(c), which require the forfeiture of any firearm or ammunition involved in or used in any violation of any other criminal law of the United States.

6. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be divided

without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendants up to the value of the forfeitable property described in this forfeiture allegation.

(Title 18, United States Code, Sections 924(d)(1) and 981(a)(1)(C); Title 21, United States Code, Section 853(p); Title 28, United States Code, Section 2461(c))

A TRUE BILL



FOREPERSON

By: Whitman G.S. Knapp, Asst. U.S. Atty
BREON PEACE
UNITED STATES ATTORNEY
EASTERN DISTRICT OF NEW YORK

No.

UNITED STATES DISTRICT COURT

EASTERN *District of* NEW YORK

CRIMINAL DIVISION

THE UNITED STATES OF AMERICA

vs.

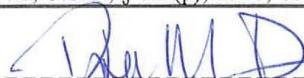
JAMES YOUNG,

Defendant.

INDICTMENT

(T. 18, U.S.C., §§ 924(d)(1), 981(a)(1)(C), 1951(a), 2 and 3551 *et seq.*;
T. 21, U.S.C., § 853(p); T. 28, U.S.C., § 2461(c))

A true bill.



Foreperson

Filed in open court this _____ day,

of _____ A.D. 20 _____

Clerk

Bail, \$ _____

Stephanie Pak, Assistant U.S. Attorney (718) 254-6064